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GREY AND KOHLWECK  
Attorneys at Law  
1821 Wilshire Boulevard, Suite 210  
Santa Monica, CA 90403

Telephone: (213) 820-4676

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF )  
CALIFORNIA, INC., a )  
California corporation, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
GERALD ARMSTRONG, et al., )  
 )  
Defendants. )

NO. C 420 153

PLAINTIFF'S REQUEST TO  
INSPECT, COPY OR  
PHOTOGRAPH RECORDS

TO DEFENDANT, GERALD ARMSTRONG, AND TO HIS ATTORNEY OF RECORD:

Request is hereby made by Plaintiff, CHURCH OF SCIENTOLOGY  
OF CALIFORNIA, INC., that you permit and arrange for the inspec-  
tion, copying or photographing of the following items:

NOTES TO ITEMS REQUESTED

NOTE 1. Each and every reference to any party to this  
action is intended, and shall be for all purposes deemed and  
construed, to constitute a reference to the party named and to  
each and all of his or its co-parties, assignors, attorneys,

1 attorneys, accountants, employees, agents and other representatives.

2 NOTE 2. The word "writing", wherever appearing in any  
3 Note or Item herein, is intended, and shall be for all purposes  
4 deemed and construed, to mean each and every writing as said term  
5 is defined in and by California Evidence Code, Section 250.

6 NOTE 3. The within Plaintiff's Request to Inspect, Copy  
7 or Photograph Records, seeks, in the case of each and every writing  
8 described or referred to herein, the original thereof, unless the  
9 same does not repose in the possession, custody or control of  
10 defendant and is not otherwise available or accessible to him, in  
11 which case the within Plaintiff's Request to Inspect, Copy or  
12 Photograph Records seeks only the items which both (1) are  
13 described or referred to herein and (2) presently repose in the  
14 possession, custody or control of, or are otherwise available or  
15 accessible to defendant.

16  
17 ITEMS REQUESTED

18 Any and all letters, memoranda, notes, records, diaries,  
19 calendars, reports, papers, documents and other written matter,  
20 and any drafts or revisions thereof relating to the subject matter  
21 of this action, including, but not limited to, any material  
22 obtained by defendant during his tenure as the custodian of records  
23 for the Archives Project of the Church of Scientology of California,  
24 including, by way of example and not limitation: journals,  
25 memoranda, drafts, notes, orders, letters, HCOB's, HCOPL's, any  
26 other form of policy or technical directives or bulletins, photo-  
27 graphs, audio and video recordings of every kind, artifacts,  
28 memorabilia, antique writings and treatises, books novels and other

1 publications of L. Ron or Mary Sue Hubbard, or any other material  
2 not above described but being a part of the Archives collection.

3  
4 Request is made that such inspection, copying or photo-  
5 graphing be made at the offices of Grey and Kohlweck, 1821  
6 Wilshire Boulevard, Suite 210, Santa Monica, CA 90403, on  
7 September 7, 1982, and thereafter until completed.

8 Such items are believed to be in your custody, control or  
9 possession and are not privileged and are reasonably calculated  
10 to discover admissible evidence.

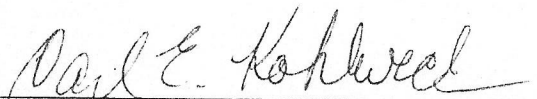
11 It is anticipated that the inspection, copying or photo-  
12 graphing will be made by use of duplicating machine.

13 This request is made pursuant to California Code of Civil  
14 Procedure Section 2031, as amended effective January 1, 1975, to  
15 which reference is hereby made.

16  
17 DATED: August 6, 1982

GREY AND KOHLWECK

18  
19 By



20 Carl E. Kohlweck  
21 Attorneys for Plaintiff  
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CERTIFICATE OF SERVICE

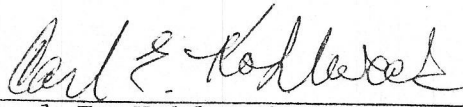
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3 I certify and state that I am and was, at all times herein  
4 mentioned, a citizen of the United States and a resident of the  
5 County of Los Angeles, over the age of eighteen years, and not a  
6 party to or interested in the within action; that my business  
7 address is 1821 Wilshire Boulevard, Suite 210, Santa Monica, CA  
8 90403.

9 That on August 6, 1982, I served the within PLAINTIFF'S  
10 REQUEST TO INSPECT, COPY OR PHOTOGRAPH RECORDS upon counsel named  
11 below by causing the same to be hand delivered to the following  
12 address:

13 CONTOS & BUNCH  
14 Attorneys at Law  
15 5855 Topanga Canyon Boulevard  
Woodland Hills, CA 91367

16 I certify and declare under penalty of perjury that the  
17 foregoing is true and correct.

18 Executed at Santa Monica, California, this 6th day of  
19 August, 1982.

20  
21  
22   
23 Carl E. Kohlweck